



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON, DC 20350-3000

IN REPLY REFER TO:

5500
CL
15 June 04

MEMORANDUM FOR MARINE CORPS INVITEES

Subj: 18TH ANNUAL SEMPER FIDELIS GOLF CLASSIC

On 20 September 2004, the Marine Corps University Foundation is hosting the 18th Annual Semper Fidelis Golf Classic. Members of Congress, Department of Defense and other federal agencies, State and Local Government, industry, and private citizens will be in attendance. The event will include a breakfast, golf tournament, dinner, and award ceremony.

This memorandum constitutes a determination that attendance by Marine Corps personnel at the golf tournament qualifies as an exception under 5 C.F.R. 2635.204(g)(2). This memorandum also constitutes a blanket determination of agency interest under 5 C.F.R. 2635.204(g)(3)(ii). Accordingly, Marine Corps personnel whose duties do not substantially affect the Marine Corps University Foundation may accept free attendance at the event, which includes the provision of food, refreshments and entertainment furnished to all attendees as an integral part of the event.

In addition, Marine Corps invitees may accept items from the Foundation with a cumulative value of \$20.00 or less. This normally applies to a tournament's "goody bag", which includes items donated to the tournament's sponsor for distribution to the players. Marine Corps invitees may not accept prizes for tournament contests if the value of the prize exceeds \$20.00.

Marine Corps personnel whose duties may substantially affect the Marine Corps University Foundation should seek an individual determination pursuant to 5 C.F.R. 2635.204(g)(3)(i) regarding this event from their local ethics counselor.

PETER M. MURPHY
Counsel for the Commandant